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Mr. R. H. Latta
Chief, Operations Division
Seattle District, C/E
4735 East Marginal Way South
Seattle, Washington 98134

Dear Mr. Latta:

This a follow-up to our November 15, 1974, letter concerning maintenance dredging of the Duwamish River. At that time we requested a time extension to notify you of our pending decision concerning possible polychlorinated biphenyl (PCB) contamination in the shoal area to be dredged just upstream from Slip No. 1. Results from our most recent survey on PCB sediment distribution had not been completed and it was important to know if PCB contamination had moved into the proposed dredging area.

The results of this sediment survey are now available and the data indicate that some PCB from the spill at Slip No. 1 has migrated into the shoal area between 82+00 and 94+00. The highest concentrations still occur in Slip No. 1, but higher values were found upstream in the river than had existed before. Although the PCB concentrations are relatively low in the proposed dredge area, there has been an increase in surface sediment levels that can be directly attributed to the spill. We will continue to monitor PCB movement in this area in order to determine whether or not it stabilizes.

If the dredging of this shoal were critical to the maintenance of navigation, we would not oppose the project based on the present PCB concentrations in these sediments. However, the PCB situation in the area immediately adjacent to the dredging site, and to a lesser degree at the site, is unstable due to the apparent movement of contaminated material along the bottom of the waterway. Consideration must be given to the potential for additional PCB to move into the dredge area over the next two to three months prior to the start of dredging. If dredging is not required, it is our recommendation that the shoal not be removed at this time.

When dredging in the spill area is required, simulation tests should be conducted to determine what concentration of PCB and trace metals would be expected from the discharge of spoil pond return water. The effectiveness of coagulants in precipitating PCB associated with fines and suspended material should be evaluated. We will be able to provide technical assistance to the Corps when these studies are necessary.

We appreciate the opportunity to evaluate our most recent data and submit these additional comments. Because of your time constraints needed to get the major upstream portion of the Duwamish project out to bid and contract, we have already contacted Mr. Bob Parker of your staff and notified him of our recommendations. If you have any questions concerning our review, contact Mr. Ronald Lee, Permits Branch, (206) 442-1352.

Sincerely,

Lloyd A. Reed
Chief
Permits Branch

bc: Bob Parker, C/E

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